

Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554

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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF SECRETARY

In the Matter of

Implementation of the Local Competition  
Provisions in the Telecommunications Act  
of 1996

CC Docket No. 96-98

DOCKET FILE COPY ORIGINAL

Interconnection between Local Exchange  
Carriers and Commercial Mobile Radio  
Service Providers

CC Docket No. 95-185

**COMMENTS IN SUPPORT OF THE  
MOTION FOR EXTENSION OF PAGE LIMIT**

By these comments, GTE Service Corporation ("GTE") respectfully requests that the Commission grant the Motion for Extension of Page Limit filed by the United States Telephone Association ("USTA") in the above-captioned proceeding.<sup>1</sup> GTE supports USTA's request to extend the page limit for oppositions to petitions for reconsideration and/or clarification given the complex issues raised in the *Interconnection Order* and the fact that petitioners were granted a waiver to file petitions of up to 50 pages.<sup>2</sup> Also, GTE agrees that the Commission should clarify that empirical economic studies and copies of relevant state orders will not be counted

<sup>1</sup> United States Telephone Association, Motion for Extension of Page Limit, CC Docket No. 96-98 (filed Oct. 18, 1996).

<sup>2</sup> See *Implementation of the Local Competition Provisions in the Telecommunications Act of 1996* (CC Docket No. 96-98), FCC 96-325 (Aug. 8, 1996) (*First Report and Order*) [hereinafter *Interconnection Order*].

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against the page limit, as was the case for comments filed in response to the original *Notice of Proposed Rulemaking*.<sup>3</sup>

As an initial matter, GTE supports USTA's motion in light of the significant number of complex issues decided in the *Interconnection Order* and raised in the petitions for reconsideration and/or clarification. There is little doubt that the Commission's rules implementing Sections 251 and 252 of the Communications Act will have a broad-reaching impact on consumers and the telecommunications industry. As USTA correctly points out, approximately 40 parties filed petitions in this proceeding, and the petitions take issue with, or seek clarification of, almost every major conclusion in the Commission's *Order*. Therefore, GTE maintains that an increased page limit is warranted in order to give parties who wish to respond to these petitions an adequate opportunity to do so and provide relevant information to the Commission.

Furthermore, GTE believes that it would be grossly inequitable to deny USTA's motion given that a nearly identical page extension request for petitions for reconsideration in this proceeding was recently granted.<sup>4</sup> In authorizing that extension, the Common Carrier Bureau correctly reasoned that the breadth and complexity of the issues raised in the *Interconnection*

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<sup>3</sup> See *Implementation of the Local Competition Provisions in the Telecommunications Act of 1996* (CC Docket No. 96-98), FCC 96-182 (April 19, 1996) (*Notice of Proposed Rulemaking*) at ¶ 291.

<sup>4</sup> See *Implementation of the Local Competition Provisions in the Telecommunications Act of 1996* (CC Docket No. 96-98) and *Interconnection Between Local Exchange Carriers and Commercial Mobile Radio Service Providers* (CC Docket No. 95-185), DA 96-1603 (Sept. 24, 1996).

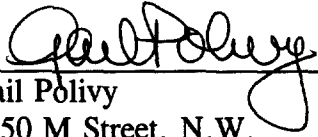
*Order* will require parties to provide more discussion than is typically required. Accordingly, the Commission should grant USTA's request because these same considerations apply to the oppositions and given the fact that such an extension has already been granted to the petitioners.

In addition, as was done regarding the comments originally filed in this proceeding, the Commission should clarify that empirical economic studies and copies of relevant state orders will not be counted against the page limit. GTE submits that econometric studies and state materials are directly relevant to the issues raised on reconsideration. Parties may not effectively respond to the petitioners' assertions if these materials are included within the page limit for oppositions in this proceeding.

Accordingly, GTE submits that good cause has been shown to grant USTA's motion.

Respectfully submitted,

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**CERTIFICATE OF SERVICE**

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